KAREN P. HEWITT
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Attorneys for Plaintiff
United States of America

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. EDUARDO BARAJAS (1), aka Eddie-Boy, VICTOR RAMOS (2), aka V, ALEJANDRO VELARDE (3), aka Lil' Al, MIGUEL RIVERA MEDINA (4) aka Vampiro, JACOB TALLAECHE (5) aka Dopey, THOMAS ALEJANDRO MANZANO (6), aka Tommy-Boy, DERIC WILLIAMS (7), aka Pelon, JULIO CESAR JIMENEZ (8), aka Foo-Foo, ERNESTO ROMAN LOPEZ (9), aka Ernie, Defendants.	Criminal Case No. 07CR2985-WQH JOINT MOTION REGARDING NONDISCLOSURE AND LIMITED USE OF WIRE TAP LINE SHEETS

The parties, United States of America, by and through its counsel KAREN P. HEWITT, United States Attorney, and MICHAEL J. CROWLEY and TIMOTHY F. SALEL, Assistant United States Attorneys, and the above-listed defendants, through their respective defense counsel, hereby

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jointly move and agree to the following regarding the use and nondisclosure of the draft wire tap "line sheets." The parties jointly move and agree that:

(1) the line sheets will only be used to assist counsel in preparing for trial and related proceedings and will not be used for any other purpose;

(2) the line sheets will not be used: (a) in connection with any motion challenging the wiretaps; (b) to examine or cross examine any witness; (c) to impeach the credibility of any witness; (d) to refresh the recollection of any witness; and (e) as trial exhibits;

(3) the line sheets and/or their contents cannot be copied, distributed, or otherwise communicated to anyone who has not signed this stipulation; and

(4) the line sheets are the property of the United States Attorney and must be returned to the Government upon demand, completion of the case, or upon the termination of counsel's representation in connection with the above-captioned case.

Respectfully submitted,

KAREN P. HEWITT
United States Attorney

DATED: January 30, 2008

/S/ MICHAEL J. CROWLEY
MICHAEL J. CROWLEY
Assistant U.S. Attorney

DATED: January 30, 2008

/S/ TIMOTHY F. SALEL
TIMOTHY F. SALEL
Assistant U.S. Attorney

DATED: January 30, 2008

/S/ STEPHEN P. WHITE
STEPHEN P. WHITE
Attorney for Eduardo Barajas (1)

DATED: January 30, 2008

/S/ MARK F. ADAMS
MARK F. ADAMS
Attorney for Victor Ramos (2)

DATED: January 30, 2008

/S/ LYNN H. BALL
LYNN H. BALL
Attorney for Alejandro Velarde (3)

DATED: January 30, 2008

/S/ ROBERT E. BOYCE
ROBERT E. BOYCE
Attorney for Miguel Rivera Medina (4)

DATED: January 30, 2008

/S/ JAMES W. GLEAVE
JAMES W. GLEAVE
Attorney for Miguel Rivera Medina (5)

DATED: January 30, 2008

/S/ NANCY BRYN ROSENFELD
NANCY BRYN ROSENFELD
Attorney for Thomas Alejandro Manzano (6)

DATED: January 30, 2008

/S/ ANTHONY EDWARD COLOMBO, JR.
ANTHONY EDWARD COLOMBO, JR.
Attorney for Deric Williams (7)

DATED: January 30, 2008

/S/ CHARLES N. GUTHRIE
CHARLES N. GUTHRIE
Attorney for Julio Cesar Jiminez (8)

DATED: January 30, 2008

/S/ HOWARD B. FRANK
HOWARD B. FRANK
Attorney for Ernest Roman Lopez (9)

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. EDUARDO BARAJAS, et al., Defendants.	Criminal Case No. 07CR2985-WQH CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that:

I, Timothy F. Salel, am a citizen of the United States over the age of 18 years and a resident of San Diego County, CA; our business address is 880 Front Street, San Diego, CA 92101-8893; I am not a party to the above-entitled action.

I have caused service of JOINT MOTION TO DECLARE CASE COMPLEX, on the following parties, by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies the following parties at their respective e-mail addresses:

(1) STEPHEN P. WHITE – Attorney for Eduardo Barajas (1)
E-Mail: spw1@sbcglobal.net

(2) MARK F. ADAMS – Attorney for Victor Ramos (2)
E-Mail: markadamsesq@yahoo.com

(3) LYNN H. BALL – Attorney for Alejandro Velarde (3)
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(4) ROBERT E. BOYCE – Attorney for Miguel Rivera Medina (4)
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(5) JAMES W. GLEAVE – Attorney for Jacob Tallaeche (5)
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(9) HOWARD B. FRANK – Attorney for Ernesto Roman Lopez (9)
E-Mail: hbfandjm@aol.com

I declare under penalty of perjury that the foregoing is true and correct.

DATED: January 30, 2008

/S/ TIMOTHY F. SALEL
TIMOTHY F. SALEL
Assistant U.S. Attorney